

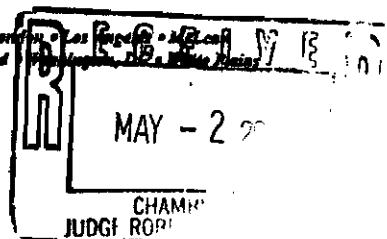
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

150 East 42nd Street, New York, NY 10017-5639

Tel: 212.490.3000 Fax: 212.490.3038

Albany • Baltimore • Boston • Chicago • Dallas • Garden City • Houston • Las Vegas • London • Los Angeles • Miami • Mexico City • Newark • New York • Orlando • Philadelphia • San Diego • San Francisco • Stamford • Washington, D.C. • White Plains
Affiliates: Berlin • Cologne • Frankfurt • Munich • Paris

www.wilsoneler.com



May 1, 2008

VIA FACSIMILE

Honorable Robert P. Patterson, Jr.
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

MEMO ENDORSED

Re: Lawrence A. Kaplan v. Beth Israel Medical Center
Docket No.: 07 CV 8842 (RPP)(DFE)
Our File No.: 08986.00006

Dear Judge Patterson:

This firm represents defendant, Beth Israel Medical Center in the above captioned matter. As per the Court's request, we write to set forth the discovery schedule as discussed with the Court during the initial conference in the referenced matter held yesterday, April 30, 2008. The parties respectfully propose the discovery schedule as follows:

- Fact discovery completion date August 31, 2008.
- Proposed date for filing dispositive motions September 30, 2008.
- Proposed date for pre-trial order (in the event that no motion for summary judgment made) October 6, 2008.

Thank you for your consideration of this proposed discovery schedule.

Respectfully Submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP


Shivani Soni

Opposition Granted
So ordered
Robert P. Patterson
5/2/08

| |
|----------------------|
| USDC SDNY |
| DOCUMENT |
| ELECTRONICALLY FILED |
| DOC #: |
| DATE FILED: 5/2/08 |

File No.: 08986.00006

Page 2

cc: Magistrate Judge Douglas F. Eaton (via facsimile)
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 1360
New York, NY 10007
(212) 805-6181

Lawrence Alan Kaplan
Plaintiff Pro Se (via email delivery and overnight mail)
222 Riverside Drive
#2E
New York, New York 10025
lawrenceakaplan@earthlink.com